

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

UNITED STATES OF AMERICA,)	
Plaintiff,)	
)	
v.)	Case No. 1:17-cr-00224-AT-CMS
)	
ALLEN J. PENDERGRASS,)	
<u>Defendant.</u>)	

**DEFENDANT’S MOTION TO MODIFY CONDITIONS OF PRETRIAL
RELEASE TO PERMIT OUT OF DISTRICT TRAVEL**

Mr. Pendergrass is currently on pretrial release. Doc. 22. As part of his release conditions, he is not permitted to travel outside the Northern District of Georgia without prior approval. Doc. 22 at 4. Mr. Pendergrass is seeking leave to travel to Cincinnati on a regular basis for the purpose of visiting his brother, who is suffering from cancer. If permitted, Mr. Pendergrass would like to travel freely between Atlanta, Georgia and Cincinnati, Ohio for the purpose of visiting his brother and assisting him during his illness. Mr. Pendergrass would report all travel to his probation officer and seek permission from that officer prior to all trips.

Counsel for Mr. Pendergrass has notified Mr. Pendergrass’ probation officer, Ben Perkins, of this request but has not received a response as of yet. Counsel has also notified AUSA Jeff Brown of this request and he has no objection.

Respectfully submitted this 20th day of May 2019.

s/Saraliene S. Durrett

CERTIFICATE OF SERVICE

This is to certify that the undersigned has this date electronically filed the foregoing motion with the Clerk of the Court using the CM/ECF system which will automatically send email notification of such filing to the following attorney(s) of record:

All Defense Counsel
All AUSAs of record

Respectfully submitted this 20th day of May 2019.

s/Saraliene S. Durrett
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